

NewsChannel

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May 29, 1996

FCC MAIL ROOM
The Honorable Reed E. Hundt, Chairman
The Honorable James H. Quello, Susan Ness
and Rachelle B. Chong, Commissioners
Federal Communications Commission
1919 M Street, N.W., Eighth Floor
Washington, D.C. 20054

Dear Chairman Hundt and Commissioners:

Broadcasters, especially those of us who are still owned by families whose lives have been tied to a particular community for generations, may be the prime source of community service among businesses in the United States. Not only do we provide countless hours of free time for public service, we also provide live local news and weather information, including severe storm warnings. If the networks have their way in revising affiliation rules, our ability to serve "in the public interest" and with a local focus will be adversely affected.

If the power to reject network programs because of content or what we consider greater local public need is eliminated, it is the public that will suffer most.

In the past, we have rejected programs, both network and syndicated, because of content which we believed to be unacceptable to the majority of our viewers, or because we believed serving the local community with another program was better. That choice has been a part of many program contracts in the past, and we believe it should remain.

We also believe interpretation of what is truly an "economic" reason for preemption of the network cannot be made objectively by any network.

For example, we have carried a live one-hour church service from Paducah's largest church for many years. They have their own television facilities and the live element is vital to them. It has aired at 11 a.m. on Sundays at a moderate fee paid by the church. Meanwhile, network sports has increasingly encroached into the pre-noon hours over the past several years, already causing preemptions of 12-15 weeks of programming by the church during major playoffs or events which have large audiences.

NBC recently decided to begin its pre-game football show at 11 a.m. on Sundays, and asked all stations to carry it. We declined, except for special occasions mentioned above. We made that decision because there are many older or incapacitated people who rely on that church service because they can't go to the church. On the other hand, the network might interpret our decision as economic even though we may generate equal or better revenue with network sports in that time period.

We also wonder about the fate of our 40-year tradition and 13-million dollars raised on the purely local Lions Club Telethon of Stars. It preempts *Saturday Night Live*, *Nightside*, *Sunday Today*, *Meet the Press* and occasionally part of a football game.

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Would this also preclude occasional paid preemptions for call-in programs concerning heart disease, cancer, mental health and other important issues, sponsored by area hospitals? Certainly, the preemption could be termed "economic" because the hospitals do pay for the time, and are businesses. Who decides if this type of programming is indeed a local service which outweighs a network entertainment show and its value to the network?

Would this also mean that our network can force us to move two teen shows back to Saturday morning instead of being delayed to Sunday morning in order to air an hour of local news on Saturday morning? No other station has a mid-morning newscast on Saturday in this market. Is that an "economic" decision because the station makes money selling advertising on the news, or is news a public service which overshadows two teen programs on the network?

We are concerned that the concentration of power in the communications industry, which continues in almost geometric progression may now begin to affect the network-affiliate relationship. That relationship, we believe, has been balanced in a way which serves both the network and the local stations/viewers better than any other communications entity.

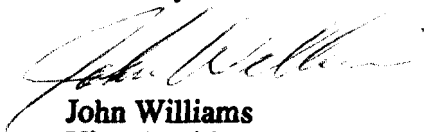
Just as the government operates on a system of checks and balances, we believe local stations provide a similar service to viewers.

We are proud of our network, and we do carry nearly all of the programs they offer. And, we certainly enjoy the fruits of the very successful network efforts of recent years in increased revenue.

However, we genuinely care for the viewers in our viewing area. We believe no one knows better how to serve their interests than a local station which has listened to their opinions through thousands of phone calls and letters or through live call-ins during our news. We try to balance that with providing a good living for the families of some 100 employees.

We ask that you consider these delicate balances when you make your decision about the network-affiliate contract rules.

Sincerely,



John Williams
Vice-President and
General Manager

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cc: **William F. Caton, Secretary (2 copies)**
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554
Re: MM Docket 95-92